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January 4, 2020

District Judge Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: 1:19-cv-08975-PGG
          Parham v. Aldi Inc.

Dear District Judge Gardephe:

This office represents the plaintiff. In accordance with your Honor's Individual Rules of Practice in Civil Cases, plaintiff, jointly with defendant, requests an adjournment of the Initial Conference scheduled for January 16, 2020 at 10:45 AM and the corresponding submission of the joint letter required to be filed seven days before the conference date.

The parties request an adjournment of forty-five (45) days and propose the conference be held on Thursday, March 5, 2019 with the joint letter seven days prior to this date, because your Honor's Rules specify civil conferences are typically held on Thursday mornings. Forty-five days are requested because defendant has not yet retained or assigned outside counsel, since service of process was not completed until December 24, 2019. On that date, defendant's general counsel, Meredith Oliva, executed the waiver of service which this office subsequently filed with the Court. ECF No. 24. Defendant has consented to this request for adjournment and the decision to seek this adjournment was a joint one given the above reasons. Thank you.

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

MEMO ENDORSED

The Conference is adjourned to April 9, 2020 at 10:30 A.M.

SO ORDERED:

Paul G Gardephe, U.S.D.J.

Jan. 6, 2020

Certificate of Service

I certify that on January 4, 2020, I served or emailed the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email
Meredith Oliva, Defendant's General Counsel, legal@aldi.us	☐	☐	☒

/s/ Spencer Sheehan
Spencer Sheehan